

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Cambridge Electric Light Company, D.T.E. 01-94)
Western Massachusetts Electric Company, D.T.E. 01-99)
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PETITION FOR INTERVENTION

Pursuant to 220 CMR 1.03 the Conservation Law Foundation ("CLF") moves to intervene in the above-captioned adjudicatory proceedings

CLF moves to intervene in this proceeding in order to present the issues and concerns in the attached letter and participate in any further hearing in the above-captioned proceedings.

CLF reserves the right to move to intervene in these proceedings as part of and/or representative and/or attorney for a citizens group pursuant to G.L. c. 30A, § 10A.

CLF is entitled to intervene in this proceeding by virtue of its deep and intimate involvement in the companion proceeding before the Vermont Public Service Board, a proceeding known as: Investigation into General Order No. 45, Notice filed by Vermont Yankee Nuclear Power Corporation Re: Proposed Sale of Vermont Yankee Nuclear Power Station and related transactions, Docket No. 6545. Moreover, CLF represents a unique point of view on this proceeding as a non-governmental environmental advocate with a long history of involvement in issues of electricity markets, finance and nuclear energy. CLF's point of view is not adequately represented by any current party to the proceeding.

WHEREFORE, CLF respectfully requests the Department to allow this Motion to Intervene.

Dated: July 29, 2002

Conservation Law Foundation

By:

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